

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

DEBRA BAKER,)	
)	
Plaintiff,)	
)	Cause No.
vs.)	
)	Division
FANGIO ENTERPRISES, INC., et al.,)	
)	
Defendants.)	

REQUEST FOR ISSUANCE OF OUT OF STATE SUMMONS

COMES NOW Plaintiff, DEBRA BAKER, by and through counsel, and requests the Clerk issue its Summons for service out of the State of Missouri to Defendant, Fangio Enterprises, Inc., at 960 Stanton Road, Olyphant, PA 18447, (Lackawanna County, Pennsylvania).

LAW OFFICE OF NATHAN S. COHEN

By: /s/ Nathan S. Cohen
Nathan S. Cohen, #36072
Attorney for Plaintiff
210 South Bemiston Avenue
St. Louis, MO 63105
(314) 727-6088 - Telephone
(314) 727-6081 - Facsimile
nathan@nathanscohen.com

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

DEBRA BAKER,)	
)	
Plaintiff,)	
)	Cause No.
vs.)	
)	Division
FANGIO ENTERPRISES, INC.,)	
)	
Serve: Fangio Enterprises, Inc.)	
960 Stanton Road)	
Olyphant, PA 18447)	
(Lackawanna County, Pennsylvania))	
)	
and)	
)	
TUESDAY MORNING, INC.,)	
)	
Serve: CT Corporation System, Registered Agent)	
120 South Central Avenue, Suite 400)	
St. Louis, MO 63105)	
(St. Louis County, Missouri))	
)	
)	
Defendants.)	

PETITION FOR DAMAGES DUE TO
NEGLIGENT DESIGN AND SALE OF PRODUCT

COMES NOW Plaintiff, DEBRA BAKER, by and through her attorney, Nathan S. Cohen, and for her Petition for Damages Due to Negligent Design and Sale of Product, states to the court as follows:

1. That at all times mentioned herein, Plaintiff is and was a resident of St. Louis County, Missouri.
2. At all times mentioned herein, Defendant Fangio Lighting is and was the designer and manufacturer of a 26.5 inch Metal Table Lamp in Black Nickel, Model Number 1484BKN, UPC

083086085659 (hereinafter the “Lamp”) for use by ultimate consumers and advertised and placed this lamp in the stream of commerce where it was sold in the State of Missouri.

3. At all times mentioned herein, Defendant Tuesday Morning, Inc., is and was foreign corporation doing business in the County of St. Louis, State of Missouri, and had offered for sale as one of its line of products, said Lamp manufactured by Defendant Fangio Lighting, one of which was purchased by Plaintiff on or about July 15, 2016, from the Tuesday Morning, Inc., retail store located at 9627 Manchester Road, St. Louis, Missouri 63119, in the County of St. Louis, State of Missouri.

4. Said Lamp so purchased was in its original carton and firmly sealed, and it had been sealed by Defendant before delivery to the retail store and to Plaintiff.

5. On October 13, 2015, while utilizing the Lamp manufactured by Defendant Fangio Lighting and marketed and sold by Defendant Tuesday Morning, Inc. in its usual intended manner in her home located at 7225 Mallard Drive, Pagedale, Missouri 63133, in St. Louis County, Missouri, a fire emanated from the Lamp causing fire, and smoke damage that destroyed Plaintiff’s house and her contents and personal property therein. See fire department report attached hereto and incorporated herein as Exhibit 1.

6. The Lamp purchased by Plaintiff was unreasonably dangerous in normal and ordinary use to Plaintiff and to Plaintiff’s home and property, and was unfit for the intended use in that it was defectively manufactured and assembled in such a way as to cause the electrical system to malfunction and cause a fire.

7. At all times mentioned herein, Defendant Fangio Lighting breached its duties to Plaintiff in the following respects:

a. Defendant Fangio Lighting did manufacture and design the Lamp, which it knew, on the exercise of reasonable care should have known, was likely to cause serious and permanent injury to individuals utilizing the Lamp in the manner and fashion in which Plaintiff utilized the Lamp.

b. Defendant Fangio Lighting did put into the stream of commerce a product that was inherently and unreasonably dangerous to those individuals, particularly to Plaintiff, who might utilize it in a normal expected fashion as utilized by Plaintiff, and particularly by creating an extremely extra-hazardous and unreasonably dangerous condition.

c. Defendant Fangio Lighting expressly and impliedly warranted and represented that the Lamp, which it placed into the stream of commerce in the State of Missouri through Defendant Tuesday Morning, Inc., was safe, well designed, and not inherently dangerous, and fit and proper for the uses and purposes intended for the Lamp; and in particular represented that the Lamp was extremely safe and did not constitute a dangerous and hazardous condition to individuals utilizing it.

8. Defendant Fangio Lighting breached the express and implied warranties, including a warranty of fitness for use, thereby resulting in serious damage to Plaintiff's home and contacts therein.

9. At all times mentioned herein, Defendant Tuesday Morning, Inc., breached its duties to Plaintiff in the following respects:

a. Defendant Tuesday Morning, Inc. sold to Plaintiff the Lamp, which was defective in its design and manufacture, with improper directions for use, and in its failure to warn as to its dangerous proclivities, thereby rendering the product inherently and unreasonably dangerous

to those individuals, particularly Plaintiff, who might utilize it in the normal expected fashion as it was utilized by Plaintiff, and particularly by creating an extremely extra-hazardous and unreasonably dangerous condition.

b. Defendant Tuesday Morning, Inc., expressly and impliedly warranted and represented that the Lamp, which it placed into the stream of commerce in the State of Missouri and which it represented to be fit and proper for the uses and purposes intended for the Lamp, including use in Plaintiff's house, was extremely safe and did not constitute a dangerous and hazardous condition to individuals using it, including Plaintiff.

7. Defendant Tuesday Morning, Inc., breached the express and implied warranties, including a warranty of fitness for use, thereby resulting in serious damage to Plaintiff's house and the contents therein.

WHEREFORE, Plaintiff prays for judgment against Defendants, jointly and severally, in an amount that is fair and reasonable and sufficient to compensate Plaintiff for damages sustained to her house and the loss of her personal property and contents in her house and is in excess of Twenty-five Thousand Dollars, and for such other and further orders this court deems just and proper in the premises.

LAW OFFICE OF NATHAN S. COHEN

By: /s/ Nathan S. Cohen
Nathan S. Cohen, #36072
Attorney for Plaintiff
210 South Bemiston Avenue
St. Louis, MO 63105
(314) 727-6088 - Telephone
(314) 727-6081 - Facsimile
nathan@nathanscohen.com




IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: MAURA B MCSHANE	Case Number: 18SL-CC01246	<div style="border: 1px solid black; padding: 5px; text-align: center;"> SHERIFF FEE PAID </div>
Plaintiff/Petitioner: DEBRA BAKER	Plaintiff's/Petitioner's Attorney/Address NATHAN S COHEN 210 SOUTH BEMISTON CLAYTON, MO 63105	
Defendant/Respondent: FANGIO ENTERPRISES, INC.	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105	
Nature of Suit: CC Other Miscellaneous Actions		

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: TUESDAY MORNING, INC.
Alias:
 R/A CT CORPORATION SYSTEM
 120 S CENTRAL AVE, STE 400
 ST. LOUIS, MO 63105

COURT SEAL OF

 ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

10-APR-2018
 Date

Joan P. Delaney
 Clerk

Further Information:
 JJ

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: MAURA B MCSHANE	Case Number: 18SL-CC01246
Plaintiff/Petitioner: DEBRA BAKER	Plaintiff's/Petitioner's Attorney/Address: NATHAN S COHEN 210 SOUTH BEMISTON CLAYTON, MO 63105
Defendant/Respondent: FANGIO ENTERPRISES, INC.	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Other Miscellaneous Actions	

(Date File Stamp)

**Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)**

<p>The State of Missouri to: FANGIO ENTERPRISES, INC. Alias:</p> <p>960 STANTON ROAD OLYPHANT, PA 18447</p>	<p>You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.</p> <p><u>10-APR-2018</u> Date</p> <p>Further Information: JJ</p>
--	---

COURT SEAL OF



ST. LOUIS COUNTY

James P. Delaney
Clerk

Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is _____ of _____ County, _____ (state).
- I have served the above summons by: (check one)
 - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years.
 - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
 - ☐ other (describe) _____.

Served at _____ (address)
in _____ County, _____ (state), on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this _____ (day) _____ (month) _____ (year)

- I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
 - ☐ the judge of the court of which affiant is an officer.
 - ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
 - ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

Service Fees, if applicable

Summons \$ _____

Non Est \$ _____

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

See the following page for directions to clerk and to officer making return on service of summons.

Directions to Clerk

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.

Referral
S's 5/10



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: MAURA B MCSHANE	Case Number: 18SL-CC01246
Plaintiff/Petitioner: DEBRA BAKER	Plaintiff's/Petitioner's Attorney/Address NATHAN S COHEN 210 SOUTH BEMISTON CLAYTON, MO 63105
Defendant/Respondent: FANGIO ENTERPRISES, INC.	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Other Miscellaneous Actions	

SHERIFF FEE
PAID

FILED

APR 25 2018
(Date File Stamp)

Summons in Civil Case

JOAN M. GILMER
CIRCUIT CLERK, ST LOUIS COUNTY

The State of Missouri to: TUESDAY MORNING, INC.

Alias:

R/A CT CORPORATION SYSTEM
120 S CENTRAL AVE, STE 400
ST. LOUIS, MO 63105

30 CTCOR

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

10-APR-2018
DateFurther Information:
JJ

Joan M. Gilmer
 Clerk

APR 13 2018

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.
☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

LCW - A. BRANDON

(name)

INTAKE SPECIALIST

(title)

☐ other *CT CORP.*Served at *St. Louis County*in *St. Louis County* (County/City of St. Louis), MO, on *APR 20 2018* (date) at *9 AM* (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary _____
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$ _____ per mile)
 Total \$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

DEBRA BAKER,)	
)	
Plaintiff,)	
)	Cause No. 18SL-CC01246
vs.)	
)	Division 2
FANGIO ENTERPRISES, INC., et al.,)	
)	
Defendants.)	

MEMORANDUM FOR CLERK

COMES NOW Plaintiff, DEBRA BAKER, by and through counsel, and files her Affidavit of Service, along with the cost bill for service, upon Defendant, Fangio Enterprises, Inc., and request said cost be taxed herein.

LAW OFFICE OF NATHAN S. COHEN

By: /s/ Nathan S. Cohen
Nathan S. Cohen, #36072
Attorney for Plaintiff
210 South Bemiston Avenue
St. Louis, MO 63105
(314) 727-6088 - Telephone
(314) 727-6081 - Facsimile
nathan@nathanscohen.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was electronically filed on April 24, 2018, with the Clerk of the Circuit Court by using the Missouri e-filing system, and that participants in the case who are registered users will be served by the system pursuant to Rule 103.08.

/s/ Nathan S. Cohen



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: MAURA B MCSHANE	Case Number: 18SL-CC01246
Plaintiff/Petitioner: DEBRA BAKER	Plaintiff's/Petitioner's Attorney/Address: NATHAN S COHEN 210 SOUTH BEMISTON CLAYTON, MO 63105
Defendant/Respondent: FANGIO ENTERPRISES, INC.	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

**Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)**

The State of Missouri to: **FANGIO ENTERPRISES, INC.**
 Alias:
**960 STANTON ROAD
OLYPHANT, PA 18447**

COURT SEAL OF

ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

10-APR-2018
 Date
 Further Information:
 JJ

[Signature]
 Clerk

Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is Process Server of Lackawanna County, PA (state).
- I have served the above summons by: (check one)
 - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years.
 - ☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to Julie Faigo (name) Manager (title).
 - ☐ other (describe) _____

Served at 960 Stanton Rd, Olyphant, PA (address)
 in Lackawanna County, PA (state), on 4/17/18 (date) at 11:26 am (time).
Francis Jolley
 Printed Name of Sheriff or Server

[Signature]
 Signature of Sheriff or Server

Subscribed and Sworn To me before this 18 (day) April (month) 2018 (year)

COMMONWEALTH OF PENNSYLVANIA
 NOTARIAL SEAL
THOMAS J MILLER SR
 Notary Public
DUNMORE BORO. LACKAWANNA COUNTY
 My Commission Expires Mar 18, 2021

☐ the clerk of the court of which affiant is an officer.
☐ the judge of the court of which affiant is an officer.
☒ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
☐ authorized to administer oaths. (use for court-appointed server)

[Signature]
 Signature and Title

Service Fees, if applicable
 Summons \$ _____
 Non Est \$ _____
 Mileage \$ _____ (_____ miles @ \$ _____ per mile)
 Total \$ _____

See the following page for directions to clerk and to officer making return on service of summons.

SEAGULL LEGAL SERVICES INC.
PO BOX 1706
SOUTHAMPTON, PA 18966

Invoice

Date	Invoice #
4/17/2018	33063A

Bill To	Case
NATHAN S. COHEN ESQ. 210 S. BEMISTON AVE. ST. LOUIS, MO 63105	BAKER V. FANGIO ENTERPRISES

Attorney	Contact	File #

Item	Description	Amount
PROCESS OF SERVICE	SERVICE OF SUMMONS & PETITION FANGIO ENTERPRISES INC. 960 STANTON RD. OLYPHANT, PA 18447 RECEIVED BY: JULIE FANGIO 11:26AM	85.00

**For your convenience, we are now accepting credit cards. Processing fee of \$5 or 3% if over \$200.

Total \$85.00

Customer Total Balance \$0.00

Phone #	Fax #	E-mail	Web Site
(215) 962-7021	(215) 357-9144	seagulllegal@yahoo.com	www.seagulllegal.com

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI**

DEBRA BAKER,

Plaintiff,

V.

FANGIO ENTERPRISES, INC.,

and

TUESDAY MORNING, INC.,

Defendants.

)
)
)
)
)
)
)
)
)
)
)

Cause No. 18SL-CC01246

TUESDAY MORNING, INC.'S DEMAND FOR JURY

COMES NOW Defendant, Tuesday Morning, Inc., by and through its attorney and respectfully demands a jury trial with a 12-person jury.

Respectfully submitted,

STANTON | BARTON LLC

By: /s/ Jonathan T. Barton
Jonathan T. Barton, #47260
8000 Maryland Avenue | Suite 450
St. Louis, MO 63105
314-455-6502
314-455-6524 (fax)
jbarton@stantonbarton.com

Attorney for Defendant, Tuesday Morning, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2018 the foregoing Demand for Jury was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Nathan C. Cohen
LAW OFFICE OF NATHAN S. COHEN
210 South Bemiston Avenue
St. Louis, MO 63105
nathan@nathanscohen.com

Attorneys for Plaintiff

/s/ Jonathan T. Barton

Jonathan T. Barton

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI**

DEBRA BAKER,

Plaintiff,

V.

FANGIO ENTERPRISES, INC.,

and

TUESDAY MORNING, INC.,

Defendants.

[illegible]

Cause No. 18SL-CC001246

ENTRY OF APPEARANCE

COMES NOW Kristin L. Jordan of the law firm of Stanton | Barton LLC, and hereby enters her appearance on behalf of Defendant Tuesday Morning, Inc. in the above-referenced matter.

Respectfully submitted,

STANTON | BARTON LLC

By: /s/ Kristin L. Jordan
Kristin L. Jordan, #69840
8000 Maryland Avenue | Suite 450
St. Louis, MO 63105
314-455-6521
314-455-6524 (fax)
kjordan@stantonbarton.com

Attorney for Defendant, Tuesday Morning, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of May, 2018 the foregoing Entry of Appearance was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Nathan C. Cohen
LAW OFFICE OF NATHAN S. COHEN
210 South Bemiston Avenue
St. Louis, MO 63105
nathan@nathanscohen.com

Attorneys for Plaintiff

/s/ Kristin L. Jordan

Kristin L. Jordan

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI**

<i>DEBRA BAKER,</i>)	
)	
Plaintiff,)	
)	
v.)	
)	Cause No. 18SL-CC01246
<i>FANGIO ENTERPRISES, INC.,</i>)	
)	
and)	
)	
TUESDAY MORNING, INC.,)	
)	
Defendants.)	

ENTRY OF APPEARANCE

COME NOW Jonathan T. Barton and the law firm of Stanton | Barton LLC, and hereby enter their appearance on behalf of Defendant, Tuesday Morning, Inc., in the above-referenced matter.

Respectfully submitted,

STANTON | BARTON LLC

By: /s/ Jonathan T. Barton
Jonathan T. Barton, #47260
8000 Maryland Avenue | Suite 450
St. Louis, MO 63105
314-455-6502
314-455-6524 (fax)
jbarton@stantonbarton.com

Attorney for Defendant, Tuesday Morning, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2018 the foregoing Entry of Appearance was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Nathan C. Cohen
LAW OFFICE OF NATHAN S. COHEN
210 South Bemiston Avenue
St. Louis, MO 63105
nathan@nathanscohen.com

Attorneys for Plaintiff

/s/ Jonathan T. Barton

Jonathan T. Barton